



Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

April 9, 2003

Mr. Wayne Pierre, Team Leader
Environmental Cleanup Office
U.S. Environmental Protection Agency
Region X
1200 Sixth Avenue
Seattle, Washington 98101

Mr. Dean Nygard, Site Remediation Manager
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, Idaho 83706

SUBJECT: Management of Wastes Generated During Operable Unit 1-07b Well Drilling -
(EM-ER-03-102)

Dear Mr. Pierre and Mr. Nygard:

During fiscal year 2003, the Operable Unit (OU) 1-07B Project plans to drill four new wells in support of in situ bioremediation. The wells will be located in accordance with the *Operable Unit 1-07B In Situ Bioremediation Remedial Design* (DOE/ID-11013, Rev. 0) and will be identified as (Test Area North) TAN-1859, TAN-1860, TAN-1861, and TAN-1862. The purpose of this letter is to document agency agreement on how waste will be managed during the drilling. This agreement was reached on the March 13, 2003, agency conference call.

Drill cuttings above the saturated zone (less than 195 ft. below ground surface) are not considered to contain RCRA-listed hazardous waste. As long as there are no radiological contaminants present, the cuttings may be discharged to the ground surface for disposal. Radiological monitoring will be performed during the drilling. If monitoring shows radiation levels in excess of 100 counts above background, then it will be assumed that the drilling has contacted F001 listed waste located above the saturated zone and containment mechanisms will be put in place to ensure that no listed waste is discharged to the environment.

Drill water and cuttings produced from within the saturated zone (greater than 195 ft. below ground surface) will be considered F001 listed hazardous waste and will be contained. Three listed waste streams will be generated during these activities. These waste streams have previously been generated and will be managed in accordance with *Operable Unit 1-07B Waste Management Plan* (INEL/EXT-98-00267, Rev. 3) as shown in Table 1.

Table 1. In Situ Bioremediation Well Drilling Waste Streams.

Waste Stream ID	Description	Planned Disposition
1-07B-022	Drilling Water	Stored in double wall containers within the OU 1-07B CERCLA Waste Storage Area (CWSA) until it can be processed through the New Pump and Treat Facility.
1-07B-031	Drill Cuttings	Stored in waste boxes within the OU 1-07B CWSA. After appropriate sampling, the waste will be disposed of in the INEEL CERCLA Disposal Facility (ICDF).
1-07B-032	Drilling Containment Pad Materials	Stored in place. Routine monitoring will be performed to determine if there is any waste within the containment pad sump. Sampling will be performed to determine final disposition in accordance with the Field Sampling Plan, INEEL/EXT-98-00569. Depending on results this waste could obtain a No Longer Contained in Determination and be left in place or be packaged and sent to the ICDF for final disposal.

This waste management approach was discussed and verbal agreement was reached with the Idaho Department of Environmental Quality and U.S. Environmental Protection Agency during the March 13, 2003, conference call. If you have any questions regarding this issue please contact Mark Shaw at (208) 526-6442.

Sincerely,



Kathleen E. Hain, Lead
Environmental Restoration Program

cc: M. Jeffers, DEQ, 1410 N. Hilton, Boise, ID 83706